

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

RIC SZABO,

Plaintiff,

v.

MUNCY INDUSTRIES, LLC,

Defendant.

:
:
:
:
:
:
:
:
:
:
:

Civil Action No. 4:21-CV-00468

**PLAINTIFF RIC SZABO'S MOTION
FOR PARTIAL SUMMARY JUDGMENT**

Plaintiff, Ric Szabo, by and through his undersigned Counsel, respectfully moves this Honorable Court, pursuant to Federal Rule of Civil Procedure 56, for partial summary judgment and requests that this Court hold that Ric Szabo was a non-exempt employee of Defendant, Muncy Industries, LLC, as a matter of law under the FLSA and the PMWA.

Respectfully submitted,

MURPHY LAW GROUP, LLC

By: /s/ Mary Kramer
Murphy Law Group, LLC
Mary Kramer, Esq.
Eight Penn Center, Suite 2000
1628 John F. Kennedy Blvd.
Philadelphia, PA 19103
mkramer@phillyemploymentlawyer.com
Attorneys for Plaintiff

Dated: September 30, 2022

CERTIFICATE OF SERVICE

I, Mary Kramer, Esq. certify that on September 30, 2022, I caused a true and accurate copy of the foregoing to be filed by ECF filing, which will send notification of such filing to the following counsel:

Gregory A. Stapp
Attorney I.D. #78247
Stapp Law, LLC
153 West Fourth Street, Suite 6
Williamsport, PA 17701
TEL: 570-326-1077
gstapp@stapplaw.net
Attorney for Defendant

/s/ Mary Kramer
Mary Kramer, Esq.

Dated: September 30, 2022